## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

AMERICAN HEALTH INFORMATION	)
MANAGEMENT ASSOCIATION,	)
Plaintiff,	)
v.	) Case No. 1:23-cv-03363
ARCHETYPE INNOVATIONS, LLC d/b/a EHR GO,	) ) )
Defendant,	)

## **MOTION TO DISMISS**

Archetype Innovations, LLC d/b/a EHR Go ("Archetype") hereby moves to dismiss the complaint filed by American Health Information Management Association. The complaint should be dismissed for lack of personal jurisdiction, improper venue, and failure to state a claim under Fed. R. Civ. P. 12(b)(2), 12(b)(3), and 12(b)(6), for the reasons set forth in Archetype's accompanying memorandum of law.

Dated: September 14, 2023 Respectfully submitted,

/s/ Steven P. Mandell

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## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that a copy of the foregoing document has been served on September 14, 2023 via the Court's CM/ECF system on all counsel of record who have consented to electronic service.

/s/ Steven P. Mandell